

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Marjorie Taylor Greene,

Plaintiff,

vs.

Brad Raffensperger, in his official capacity as Secretary of State of the State of Georgia, *et al.*,

Defendants,

and

David Rowan, et al.,

Intervenor Defendants.

Case No. 1:22-cv-1294-AT

**Rowan Intervenors'
Answer**

Intervenor defendants David Rowan, Donald Guyatt, Robert Rasbury, Ruth Demeter, and Daniel Cooper (collectively, the “Rowan Intervenors”), respectfully submit this answer to plaintiff Marjorie Taylor Greene’s verified complaint (ECF 3).

1. Denied.
2. Admitted.
3. Denied.

4. Denied.

5. Denied.

6. Admitted.

7. Denied.

8. Denied.

9. Admitted.

10. Admitted.

11. Admitted.

12. Admitted.

13. The Rowan intervenors lack knowledge or information sufficient to form a belief as to the allegations in paragraph 13.

14. Admitted.

15. Denied.

16. Denied.

17. Admitted.

18. Admitted.

19. Admitted.

20. Denied.

21. Admitted.

22. Denied.

23. Denied.

24. Admitted.

25. Admitted.

26. Admitted.

27. Admitted.

28. Admitted.

29. Admitted.

30. The allegation in paragraph 30 is admitted. The Rowan intervenors lack knowledge or information sufficient to form a belief as to the allegations in footnote 1.

31. Admitted.

32. Admitted.

33. Admitted.

34. The allegation in the first sentence of paragraph 34 is admitted. The Rowan intervenors lack knowledge or information sufficient to form a belief as to the allegations in the second sentence of paragraph 34.

35. The allegation in the first sentence of paragraph 35 is admitted. The Rowan intervenors lack knowledge or information sufficient to form a belief as to the allegations in the second sentence of paragraph 35.

36. The Rowan intervenors lack knowledge or information sufficient to form a belief as to the allegations in paragraph 36.

37. Denied.

38. Admitted.

39. Paragraph 39 is a legal conclusion to which no response is required.

40. Paragraph 40 is a legal conclusion to which no response is required.

41. Denied.

42. Admitted.

43. Paragraph 43 is a legal conclusion to which no response is required.

44. Admitted.

45. Paragraph 45 is a legal conclusion to which no response is required.

46. Denied.
47. Admitted.
48. Paragraph 48 is a legal conclusion to which no response is required.
49. Paragraph 49 is a legal conclusion to which no response is required.
50. Paragraph 50 is a legal conclusion to which no response is required.
51. Paragraph 51 is a legal conclusion to which no response is required.
52. Denied.
53. Denied.
54. Paragraph 54 is a legal conclusion to which no response is required.
55. Admitted.
56. Admitted.
57. Denied.
58. Paragraph 58 is a legal conclusion to which no response is required.

59. Denied.

60. Denied.

61. Denied.

62. Admitted.

63. Denied.

64. Paragraph 64 is a legal conclusion to which no response is required.

65. Denied.

66. Paragraph 66 is a legal conclusion to which no response is required.

67. Denied.

68. Paragraph 68 is a legal conclusion to which no response is required.

69. Denied.

70. Denied.

71. Denied.

72. Admitted.

73. Denied.

74. Admitted.

75. Denied.

76. Denied.

77. Denied.

Affirmative Defenses

1. Greene's complaint fails to state a claim for relief.
2. The Court lacks subject-matter jurisdiction over Greene's claims.
3. There is no private right of action under the Amnesty Act of 1872.
4. There is no private right of action to enforce the Amnesty Act of 1872 under 42 U.S.C. § 1983.
5. Greene's claims are not ripe.

Respectfully submitted this 25th day of April, 2022.

/s/ Bryan L. Sells

Georgia Bar No. 635562
The Law Office of Bryan L. Sells, LLC
PO Box 5493
Atlanta, Georgia 31107-0493
Telephone: (404) 480-4212
Email: bryan@bryansellslaw.com

Ronald Fein*
John C. Bonifaz*
Ben Clements*
Courtney Hostetler*
Benjamin Horton*
FREE SPEECH FOR PEOPLE
1320 Centre St. #405
Newton, MA 02459
(617) 244-0234
rfein@freespeechforpeople.org

Jonathan S. Abady*
Andrew G. Celli, Jr.*
Sam Shapiro*
Andrew K. Jondahl*
EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP
600 Fifth Avenue, 10th Floor
New York, NY 10020
(212) 763-5000
jabady@ecbawm.com
acelli@ecbawm.com

Attorneys for the Rowan Intervenors

* Admitted pro hac vice

Certificate of Compliance

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing document has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan L. Sells

Bryan L. Sells